

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA, <i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
THE STATE OF TEXAS, <i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
THE STATE OF LOUISIANA, <i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Civil Action No. 2:21-CV-00022-Z
	§	
PLANNED PARENTHOOD	§	
FEDERATION OF AMERICA, INC.,	§	
PLANNED PARENTHOOD GULF	§	
COAST, INC., PLANNED	§	
PARENTHOOD OF GREATER	§	
TEXAS, INC., PLANNED	§	
PARENTHOOD SOUTH TEXAS,	§	
INC., PLANNED PARENTHOOD	§	
CAMERON COUNTY, INC.,	§	
PLANNED PARENTHOOD SAN	§	
ANTONIO, INC.,	§	
	§	
	§	
<i>Defendants.</i>	§	
	§	

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**PLAINTIFFS' DESIGNATION OF TESTIFYING EXPERT WITNESS**

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Pursuant to the Scheduling Order (Dkt. 72), Plaintiffs hereby file their Designation of Testifying Expert Witness in the above-captioned case as follows:

**RETAINED EXPERT**

Donald E. Lochabay, Jr., CMA  
Managing Director  
Alvarez & Marsal Disputes and Investigations  
2100 Ross Avenue  
21st Floor  
Dallas, Texas 75201  
(214) 438-8440

A detailed description of the opinions Mr. Lochabay will offer, and the bases for same, is contained in the Expert Report of Donald E. Lochabay, Jr., which are being served on Defendants today in accordance with Federal Rule of Civil Procedure 26(a)(2)(B).

Plaintiffs further reserve the right to designate rebuttal experts pursuant to ¶ 5 of Scheduling Order and any amendments thereto. Plaintiffs further reserve the right to supplement and/or amend these designations, if necessary, in response to additional information and discovery, pursuant to the Federal Rules of Civil Procedure.

Respectfully submitted,

**KEN PAXTON**  
Attorney General of Texas

**BRENT WEBSTER**  
First Assistant Attorney General

**GRANT DORFMAN**  
Deputy First Assistant Attorney General

**SHAWN E. COWLES**  
Deputy Attorney General for Civil Litigation

*/s/ Raymond Charles Winter*  
**RAYMOND CHARLES WINTER**  
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*/s/ Andrew B. Stephens*  
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**ATTORNEYS FOR RELATOR**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing document was filed electronically via CM/ECF on July 1, 2022, causing electronic service on all counsel of record.

*/s/ Raymond Charles Winter*  
**Raymond C. Winter**